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GBS Data Subject Access Request (DSAR) Policy



Version Control



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Global Banking School Data Subject Access Request (DSAR) Policy

1. Purpose and Scope

1.1 Global Banking School (GBS) needs to collect, store and process personal data about its staff, students, and other individuals it has dealings with, to carry out our functions and activities. GBS is a controller for most of the personal data it processes and is committed to full compliance with the applicable data protection legislation. The Data Protection Act 2018 (DPA) and the United Kingdom General Data Protection Regulation (UK GDPR) gives individuals rights of access to their personal records held by GBS, subject to certain exemptions.

Subject Access R

1.2 GBS regards the Data Protection Act as an important mechanism in achieving an honest, safe, and open relationship with its students and staff. Requests may be received from members of staff, students, members of the public and any other individual who GBS has had dealings with and holds data. This policy explains how GBS will fulfil its obligations under the Act and provides a guide to staff in dealing with subject access requests that may be received.

2. Role and Responsibilities

2.1 GBS

data controller.

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Information aTm0 95140034 members



its staff, students, customers, providers, and partners in compliance with the applicable data protection rules. Any issues related to Data Protection and compliance issues, please contact dpa@globalbanking.ac.uk.

2.1.3



3.5 Requests may sometimes be received from the Police, HMRC or other verified public bodies such as Student Loans Company under for the following purposes:

The prevention or detection of crime.

The apprehension or prosecution of offenders.

The assessment or collection of tax or duty.

3.6 The request should be signed by a Senior Officer from the relevant authority. The request must make it clear that one of the above purposes is being investigated and that not receiving the information would prejudice the investigation.



threshold to satisfy.

4.4 GBS in some circumstances may extend the time limit by a further two months if the request is complex or *if* several requests are made from the same individual.

5. Verification

5.1 Staff must ensure a request has been received in writing where a data subject is asking for sufficiently well-defined personal data held by GBS. The Data Protection



Emails (including archived emails and those that have been deleted but are still recoverable).

Word documents, spreadsheets, databases, systems.

CCTV, removable media (for example, memory sticks, floppy disks, CDs)

Tape recordings, paper records in relevant filing systems etc.

6.7



6.11 GBS will search databases and other systems and applications where the personal data may be held and erase it within 1 month from the date of the request. In the case of rectifying inaccurate personal data, GBS staff must rectify the information without delay and notify the data subject that this has been completed.

7. Exemptions

7.1 To ensure that people receive only information about themselves, it is essential that a formal system of requests is in place. Certain information may be exempt from disclosure so GBS staff must consider the below exemptions and decide whether these can be relied upon.

7.2 In practice, this means that GBS staff may be entitled to withhold some documents entirely or may need to redact parts of them. Care should be taken to ensure that documents are redacted properly. The exemptions are set out in Schedules 2 and 3 of the DPA 2018 and these include:



information, depending on the circumstances. GBS can also refuse to comply with a SAR

request, the individual must be informed of:

The reasons why.

Their right to make a complaint to the ICO or another supervisory authority; and

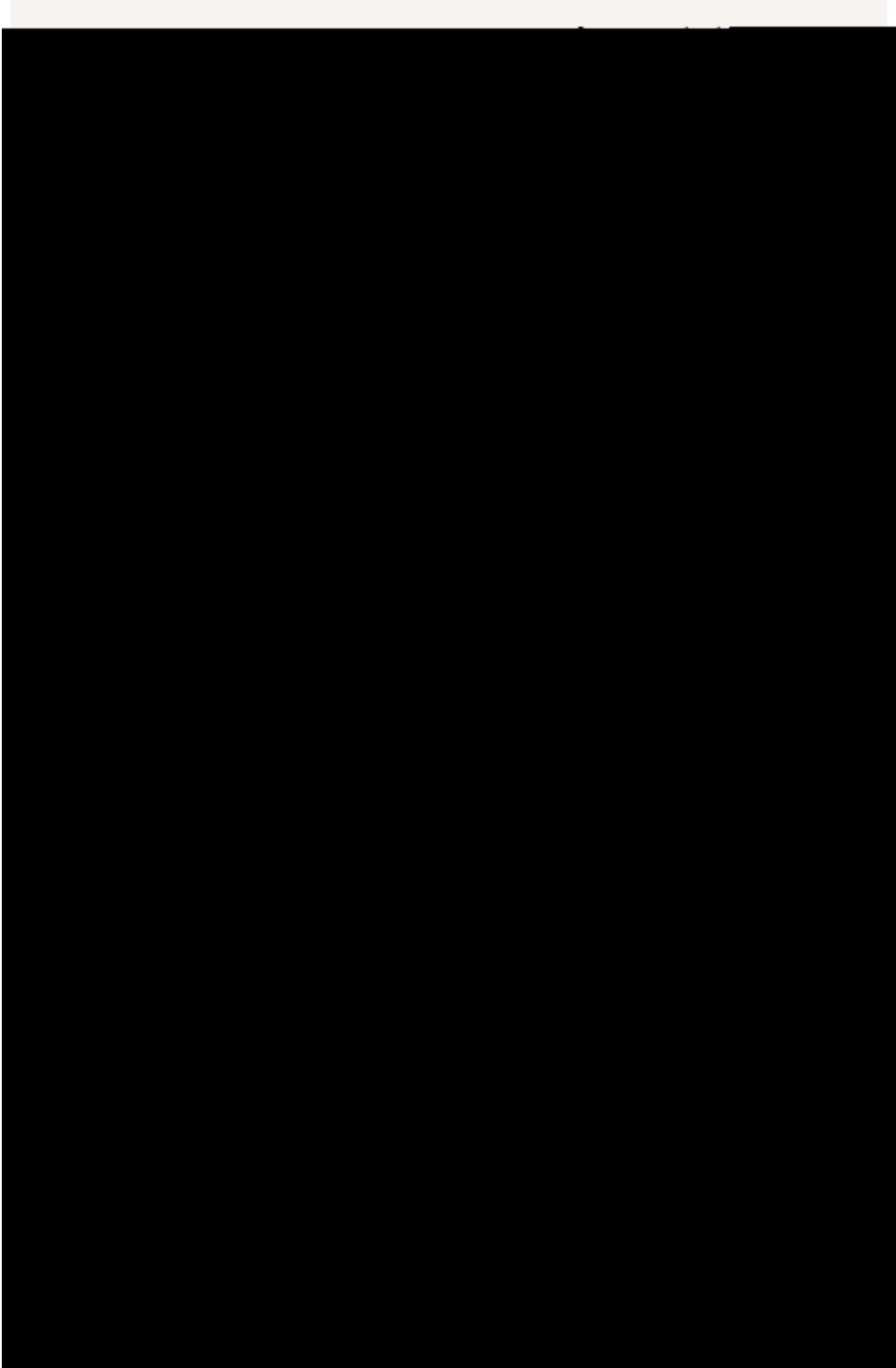
Their ability to seek to enforce this right through the courts.

7.4 If a request involves information about other individuals, GBS will consider whether it is possible to comply with the request without disclosing information that identifies another individual. If this is not possible, GBS does not have to comply with the request except where the other individual consents to the disclosure or it is reasonable to comply with

7.5 Data on a deceased person is confidential however it is not covered by the Data Protection Act but instead by the Freedom of Information Act. In deciding whether to allow access to an individual requesting information in relation to a deceased person staff will need to consider any responsibility of confidentiality to that deceased person. Staff should also consider



Annex 1- Example of a Subject Access Request



Please note, the above subject access request example was obtained from the [ICO website](#).



Information Commissioner's Office ("ICO") ICO is the independent regulatory office in charge of upholding information rights in the interest of the public.

Breach any act or omission that compromises the security, confidentiality, integrity or availability of personal data.



Annex 4- GBS Subject Access Request Flow Chart

